

LAW OFFICES OF JOSEPH P. McGOVERN

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February 22, 2007

Hon. Gary L. Sharpe, U.S. District Judge
James T. Foley U.S. Courthouse
445 Broadway, Room 441
Albany, NY 12207

RE: Schumacher v. OPRHP, et al:
05-CV-0753 (GLS) (DRH)

Dear Judge Sharpe:

This office represents Defendant Peter Beaudry. Defendants have filed Motions for Summary Judgment. On February 21, 2007 we received notice of plaintiff's re-docketed reply. We respectfully request an extension of time to submit defendants' response. In light of plaintiff's submission we believe it is necessary to obtain non-party witness affidavits and because of Spring breaks, holidays and other commitments this may be difficult to achieve without an extension.

Megan Brown of the NYS Attorney General's Office consents to the extension of time. I have forwarded a copy of this letter to plaintiff's counsel. **We request that defendants submit their response by Monday April 2, 2007.** This is Defendant Beaudry's first request for an extension.

Very truly yours,
/s/ Joseph P. McGovern, Esq.

Cc:
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